

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.

Y.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION THIS
DOCUMENT RELATES TO:

4:23-cv-05448

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR

**DECLARATION OF ALBERT TIBERI
REGARDING UNDUE BURDENS FOR
THE STATE OF HAWAII
DEPARTMENT OF EDUCATION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

I, Albert Tiberi, hereby declare and state as follows:

1. I am an Advisory Services Specialist III for the Office of the Superintendent in the State of Hawaii's Department of Education ("DOE") and make this declaration based on personal knowledge.

2. DOE is one of the largest departments for the State of Hawai'i, with around 40,000 employees, 258 schools, and over 160,000 students under its umbrella.

3. Unlike other states across the country, Hawai'i operates on a single-district school system that is overseen by the State.

1 4. As such, Hawaii's public schools are funded directly and operated by the State, as
2 opposed to being funded by real property taxes and operated by local districts.

3 5. To my knowledge, Hawai'i is the only state in the country with this system.

4 6. Hawaii's unique school system poses a special challenge in responding to

5 Defendant Meta Platforms, Inc.'s ("Meta") deposition topics, particularly for topic numbers 1-6 in
6 Meta's amended Rule 30(b)(6) deposition notice, dated January 21, 2025.

7 7. Each of the over 258 schools may operate or have operated their own social media
8 handles during the Relevant Period set by the notice.

9 8. Each of the over 258 schools may have their own programs, practices, procedures.
10 initiatives, efforts, or actions regarding the use of social media as well.

11 9. To my knowledge, the DOE does not maintain a log of communications by each of
12 the over 258 schools with any social media platforms or third parties, nor do the schools report to
13 DOE on such communications.

14 10. Given the number of schools within DOE's system, attempting to designate a
15 deponent to testify on behalf of all matters concerning DOE will be extremely challenging and
16 burdensome for DOE, especially with the extensive 12-year Relevant Period set by the notice.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct.

19 Executed on March 17, 2025, in Honolulu, Hawai'i.



James M. Fife